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April 19, 2024

VIA ECF

Pamela K. Chen, U.S.D.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East, Courtroom 4F North
Brooklyn, New York 11201-1804

Re: *IME Watchdog, Inc. v. Gelardi, et al.*
Case No.: 1:22-cv-1032 (PKC)(JRC)

Dear Judge Chen:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC (collectively, “Defendants”) and write in opposition to plaintiff’s request for an emergency, mandatory temporary restraining order (“TRO”) directing Defendants to, among other things, shut down the domain name <http://www.newyorklawyerdaniellalevi.com> (the “Domain Name”) and to transfer the Domain name to plaintiff’s principal, Daniella Levi.

Plaintiff’s request for a mandatory TRO should be summarily denied where plaintiff has failed to submit one iota of evidence linking Defendants to the Domain Name. Plaintiff’s accusations are supported by nothing more than hearsay innuendo in an attorneys’ letter brief and fall far short of meeting the requirements of obtaining a mandatory TRO, particularly where Defendants could not comply with the requested TRO unless they were in fact in charge of the Domain Name. In that respect, Defendants have categorically denied to me that they had any involvement with the Domain Name whatsoever. Defendants advise me that they seek only to extricate themselves from this litigation and to avoid further involvement with Ms. Levi.

Respectfully,

/s/ Jonathon D. Warner

JDW/ks

cc: All counsel (via ECF)